

ER

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK ss.

SUPERIOR COURT DEPARTMENT
CIVIL ACTION NO.:

CATHERINE MORRILL,

Plaintiff,

v.

Civil Action No.:

**BETH ISRAEL DEACONESS LAHEY
HEALTH MEDICAL CENTER and BETH
ISRAEL LAHEY HEALTH, INC.,**

Defendants.

COMPLAINT AND JURY TRIAL DEMAND

I. PARTIES

1. Plaintiff, Catherine Morrill, (hereinafter, "Morrill" or "Plaintiff"), is fifty-five (55) years old. She was employed with Defendant for seventeen (17) years as a Registered Nurse, Case Manager, from March 2005 until July 21, 2022, when she was unlawfully terminated from her employment.
2. Defendant Beth Israel Deaconess Medical Center ("BIDMC") is an affiliate of Defendant Beth Israel Lahey Health, Inc. ("BILH"). For the purposes of this Complaint the term "BILH" refers to both "BILH" and "BIDMC" collectively.
3. Defendant BILH is an organized Massachusetts corporation, with a principal office located at 20 University Road, Suite 700, Cambridge, Massachusetts 02138.

4. BILH is the second largest healthcare system in Massachusetts which includes a number of affiliated hospitals, which are operated, administered, and run in common under its control.
5. Defendant BILH is an employer within the meaning of 42 U.S.C. Sec 2000e (b) and M.G.L. c 151B, Sec1(5).
6. BILH negligently and wrongly terminated Morrill's employment on July 26, 2022, after first putting her on administrative leave for two weeks, July 12 to July 26, 2022.
7. Morrill filed timely charges with the Massachusetts Commission Against Discrimination ("MCAD"). The United States Equal Employment Opportunity Commission ("EEOC") has issued Morrill her "right-to-sue" notice. Morrill brings this lawsuit within ninety (90) days of receipt of her "right-to-sue" notice. All preconditions for filing this lawsuit have been performed or have occurred.
8. The Court has jurisdiction in this matter pursuant to 42 U.S.C § 1983 and Sec 2000e-5 (f) and 28 U.S.C §§ 2201, 2202 and Sec 1331 and 1343 (a) and has supplemental jurisdiction over State law claims.

II. FACTS

9. Morrill was fifty-three (53) years old and worked at BILH for over seventeen (17) years when she was negligently and wrongly terminated from BILH because she was denied accommodations based on her medical exemption and her religious exemption requests.

10. Morrill was very specific and articulated the reasons for her medical exemption request, provided evidence of the same and additionally provided evidence of her sincerely held religious beliefs to BILH.
11. As of June 15, 2021, the former Massachusetts Governor, Charles D. Baker, (hereinafter, “Baker”), terminated the “Covid-19” State of Emergency. As a matter of law and fact, **after June 15, 2021**, the Commonwealth of Massachusetts declared there was no longer any “Covid-19 Emergency” in existence.
12. Morrill contends that the denial of her accommodation request and BILH’s illegal and unconstitutional Vaccine Policy, was a ruse to terminate her employment and prevent her from collecting her retirement benefits.
13. On August 10, 2021, BILH sent an email announcing that Covid-19 and influenza vaccines would be required for all employees by October 31, 2021. BILH stated that “workforce members in need of an exemption from this policy due to a medical reason, or because of a sincerely held religious belief, must submit a request for exemption to Employee Health (medical) or Human Resources (religious) on the forms provided...” If an employee did not comply, they would first be put on administrative leave for two weeks to provide time for them to comply. If they did not get the required vaccines after the two-week leave period, they “will be considered to have voluntarily resigned their employment.”
14. BILH essentially implemented their own Mandatory Covid-19 Vaccine Policy, (hereinafter, the “Vaccine Policy”), almost two (2) months **after** Governor Baker terminated the “Covid-19” State of Emergency in Massachusetts.

15. There had never been an Employee Vaccine Mandate or Vaccine Policy in existence at BILH prior to the Covid-19 Vaccine Policy.
16. BILH policymakers acted on that Vaccine Policy, leading to Morrill's deprivation of statutory and constitutional rights.
17. BILH is a provider of injections of the Covid-19 vaccines to the public.
18. BILH was under a state policy of the CDC Covid-19 Vaccination Program Providers Agreement and under 21 U.S.C. §360bbb-3 via the Emergency Use Authorization (EUA) letters issued by the Food and Drug Administration (FDA) and or United States Department of Health and Human Services (HHS Secretary) for each of the Covid-19 vaccines.
19. The CDC and/or FDA assigned specific duties to BILH either as an "emergency response stakeholders" and or as a "Vaccination Provider."
20. BILH acted under the coercion of the Centers for Medicare and Medicaid Services' (hereinafter, "CMS") vaccine mandate. The rule required all CMS-funded health care facilities, which encompasses all facilities that accept Medicare or Medicaid funds, to put in place policies to ensure that all staff be vaccinated, subject to limited exceptions.
21. On March 1, 2022, Morrill emailed Employee Health, requesting a medical exemption from the second Covid-19 vaccine and booster. Morrill, **against her will, under duress and afraid of losing her employment**, received the first Moderna vaccine in August 2022, and immediately experienced several clinically significant and chronic, disabling reactions, including debilitating headaches, joint pain and body rashes. Her daily headaches lasted for over eight (8) weeks. To this

day, Morrill continues with aches in her joints and an exacerbation in her eczema. Morrill reached out to her primary care physician and had follow up appointments, including a brain MRI, and both neurology and allergy consultations. Morrill submitted documentation and testing results that solidified her adverse and negative reactions to the Covid-19 vaccine. On March 3, 2022, Employee Health responded and extended a temporary Covid-19 vaccination extension until April 1, 2022.

22. BILH denied Morrill's medical exemption stating that the documentation provided by Morrill's physician did not suffice to establish a contraindication to Covid-19 vaccination and her temporary medical exemption expired on April 1, 2022.
23. On April 12, 2022, Morrill submitted a "Request for Religious Accommodation" to BILH.
24. Morrill is a devout Christian, and her religious beliefs are based on the Bible and her God-given natural immunity, as opposed to man-made, artificial immunity derived from Covid-19 vaccines. Morrill asserted to BILH in her request, that she went with God's faith to receive the first Covid-19 vaccine which caused her much physical harm and moving forward could not in good conscience allow any other vaccine into her body as she feels it goes directly against her teachings.
25. Morrill stated in writing to BILH an evident case under Title VII of the Civil Rights Act, 42 U.S.C. § 2000e *et seq* of her sincerely held religious belief.
26. BILH unlawfully denied Morrill's request for religious accommodation on June 28, 2022.
27. Morrill requested to speak to someone at BILH about the Covid-19 Accommodation Denial Process and/or Appeal process. She also asked for their

documentation on how they made their decisions and for the list of people who were on this review board, and asked if medical doctors were involved in her denial process. BILH failed to respond.

28. BILH **failed** to have an Interactive Process with Morrill.

29. This entire process caused Morrill to experience an enormous amount of stress, anxiety, sleepless nights, and sadness, that continues to this day.

30. To reiterate, Morrill was fifty-three (53) years old at the time of her negligent and wrongful termination from BILH and had already taken the first Covid-19 vaccine in August 2022, with horrific, physical, long-lasting side effects.

31. On April 1, 2022, Morrill was placed on unpaid administrative leave by BILH.

32. On June 28, 2022, Morrill received an official termination letter from BILH.

33. On July 26, 2022, Morrill was officially terminated by BILH.

34. As a result of her termination, Morrill suffered stress and turmoil in her life. The termination has denied her the ability to continue in a career that she loved and built for over thirty-five (35) years. This termination made her feel like a second-class citizen that has no rights or benefits. It has caused her significant financial harm.

35. The COVID-19 vaccines are under Emergency Use Authorization¹ (EUA), Emergency Use Instructions (EUI), or the Public Readiness and Emergency Preparedness Act, referred to as the PREP Act, authority (EUA/EUI/PREP Act), all preempted by the United States Constitution Article I.

36. Congress only has the authority to mandate a Vaccine Policy.²

¹ Emergency Use Authorization (EUA) is the use of unapproved drugs, devices, or biological products, or emergency use authorization of approved drugs, devices, or biological products for an unapproved use.

² 42 USC 247d-6d & 42 USC 247d-6e (Prep Act); 21 U.S.C. §360bbb-3 (the EUA/EUI statute)

37. BILH lacked authority to take action to require compulsory use of EUA drugs, and mandatory participation in PREP Act products and it violated Morrill's substantive due process rights.
38. Congress required BILH to ensure persons under its authority were aware of their **lawful rights to accept or refuse the Covid-19 vaccines**. BILH wrongly states that it is only between BILH and Morrill, but such language does not exist in the EUA statute.
39. Morrill's allegations herein only relate to BILH depriving her of **her right to refuse - EUA/EUI/PREP Act- unlicensed vaccine product**.
40. For the EUA products Congress requires the United States Secretary of Health and Human Services (HHS Secretary) to ensure individuals considering the use of the product are informed of their legal rights³ under the statute (i.e., the option to accept or refuse) and to ensure individuals are not subjected to medical experimentation outside of their free consent and/or harmed by medical products not effectively researched for safety and efficacy.⁴
41. The right to accept, exempts products not licensed by the FDA for general commercial marketing 21 U.S.C. § 355(a)⁵ during the declared emergency; thus, the individual has the legal authority to use the unlicensed product. On the other hand,

³ 21 U.S.C. § 360bbb-3(e)(1)(A)(ii)(III).

⁴ In the context of COVID-19 vaccines, the mandatory conditions of 21 U.S.C. §360bbb-3 for the vaccine are intended to provide people with enough information to be able to give their informed consent to being injected with an experimental emergency use authorization product.

⁵ 21 U.S.C. § 355(a) (FDCA; Drugs and Devices; New Drugs): "No person shall introduce or deliver for introduction into commerce any new drug, unless an approval of an application filed pursuant to subsection (b) or (j) is effective with respect to such drug."

the right to refuse the unlicensed use of the product ensures that the federal government and persons under its authority comply with the laws pertaining to the investigational use of unlicensed drugs, biologics, and devices.⁶

42. The CDC issuance of EUIs, under the 21 U.S.C. §360bbb-3 authority of the HHS Secretary, are subject to the same treaties, laws, federal agreements, and federal contracts as EUAs. Therefore, the same strict requirements and conditions applies to BILH's actions regarding EUI products as if they were EUAs products.

43. A drug or biologic under EUA/EUI is considered investigational regardless of its name and cannot have a licensed indication for its emergency use.⁷

44. As for the PREP Act,⁸ it provides immunities for persons volunteering for "covered" activities. Accordingly, the HHS Secretary issued a PREP Act declaration for Medical Countermeasures against COVID-19 in February 2020.⁹ [85 FR 15198]. The PREP Act requires only **voluntary participation**.

45. The PREP Act strips an individual of their due process rights to seek judicial relief should injury occur from using a product under the statute's authority, **but only after**

⁶ 45 CFR Part 46, the Belmont Report, Article VII of the ICCPR Treaty, Federal Wide Assurance program, CDC COVID-19 Vaccination Program Providers Agreement, among others.

⁷ 21 U.S.C. §360bbb-3(a)(2) (A, B). In addition, CDC claimed authority to grant expanded access protocols cites as Emergency Use Instructions for the unlicensed use of licensed and EUA drugs and biologics does not exist in federal law.

⁸ 42 USC 247d-6d & 42 USC 247d-6e

⁹ Medical countermeasure (MCM): Medical products authorized under National Defense Authorization Act 2004 TITLE XVI—Defense Biomedical Countermeasures <https://www.govinfo.gov/content/pkg/PLAW-108publ136/pdf/PLAW-108publ136.pdf>

the person legally and effectively consents¹⁰ to the use of the product. This is the reason why the “program” is under “voluntary conditions.”

46. All drugs, biologics, or devices under Defendants’ mandate are under the federal authority of the PREP Act. [42 USC 247d-6d & 42 USC 247d-6e].

47. BILH is expressly preempted by Congressional authority from using their authority to interfere with Morrill’s granted right to determine voluntary participation in a PREP Act “covered countermeasure.” Congress preempts any legal entity from enforcing a countermeasure under the PREP Act.

48. On August 10, 2021, BILH issued their own Mandatory Covid-19 Vaccine Policy, unlawfully, requiring Morrill to inject an EUA, EUI, or PREP Act- COVID-19 vaccine product into her body by October 31, 2021, as a condition of continued employment in violation of the United States Constitution and Morrill’s Fourteenth Amendment guarantees. Such mandate cannot be lawful using EUA/EUI/PREP Act unlicensed products. BILH relied exclusively on EUA, EUI, and PREP Act countermeasures for Morrill to comply with their vaccine mandate. ¹¹

49. Morrill asserted her individual absolute Constitutional and federal statutory right to refuse the administration of an Emergency Use Authorization (EUA), Emergency Use Instructions (EUI) and/or PREP Act- COVID-19 Vaccine, without losing a

¹⁰ Investigational uses of products funded or under federal authority must comply with 45 CFR § 46.116, 122 and the Belmont Report which defines “legally effective informed consent.” Defendants are not authorized to obtain Plaintiff’s consent and such fact demonstrates its mandate is ultra vires. Hospitals have dual roles; (1) employer and (2) medical practitioner. The employer is not authorized to obtain consent and it is the employer issuing the mandate in this case.

¹¹ The Centers for Medicare & Medicaid Services Rule CMS 3514-IFC, Publication Date was 11.05.2021 after the issuance of Defendant vaccine policy. Of Note: no U.S. Supreme Court decision had upheld such CMS rule as Defendant incorrectly claims.

benefit and employment to which she is otherwise entitled. Such a right is not dependent upon Morrill seeking a religious or medical exemption.

50. Morrill contends that Congress *prohibits* BILH from establishing EUA, EUI, or PREP Act conditions requiring her to surrender her statutory rights and Constitutional protections as a condition to enjoy the privileges and benefits offered by BILH.

51. As a matter of law, no person can mandate the use of an *unlicensed* drug, biologic, or device of another person as a condition of employment.

52. BILH's willful and wanton disregard for the federal Constitution, federal laws and the authority of the United States Congress caused a real life-altering event to Morrill's financial, emotional, and physical well-being.

**THE COVID-19 VACCINES ARE NOT EFFECTIVE AT STOPPING THE SPREAD OF
THE DISEASE**

53. Following an announcement by the Food and Drug Administration (hereinafter, "FDA") on August 2, 2021, claiming that vaccines were ninety-one percent (91%) effective in preventing Covid-19 (Pfizer), it became immediately clear that was not true.

54. Illustrating by example are the following list of visible persons that became infected by Covid-19 despite having been injected with a Covid-19 vaccine along with the date their infection was announced:

08-19-2021 U.S. Senator John Hickenlooper

U.S. Senator Angus King

U.S. Senator Roger Wicker

10-19-2021 Dept Homeland Security Secretary Alejandro Mayorkas

12-19-2021 U.S. Senator Elizabeth Warren

01-02-2022 Dept of Justice Secretary Lloyd Austin
03-13-2022 U.S. President Barack Obama
03-31-2022 CIA Director William Burns
04-05-2022 U.S. Attorney General Merrick Garland
04-07-2022 U.S. House Speaker Nancy Pelosi
04-09-2022 U.S. Dept of Agriculture Secretary Tim Vilsack
04-26-2022 U.S. Vice-President Kamala Harris
05-04-2022 U.S. Secretary of State Anthony Blinken
06-01-2022 U.S. Labor Secretary Marty Walsh
06-15-2022 Dr. Anthony Fauci
06-2022 U.S. Senator Wicker for 3rd time (02-2022)
07-10-2022 U.S. Senate Majority Leader Charles Schumer
07-21-2022 U.S. President Joseph Biden
10-22-2022 CDC Director Rochelle Walensky

55. Public Health Officials now acknowledge the fallacy of claims of protection afforded **by vaccines against Covid-19.**

a. **Dr. Deborah Birx:** (Former White House Coronavirus Response Coordinator):

“I knew these vaccines were not going to protect against infection and I think we overplayed the vaccines”. <https://youtu.be/8aYqTlg1A>

b. **Dr. Anthony Fauci:**

“We know that people get infected and then get reinfected and people get vaccinated, and they get infected. So, immunity isn’t measured in decades or lifetimes. It’s measured in several months”.

<https://www.marketwatch.com/articles/Anthony-fauci-covid-19-biden-immunity-51658437525?shtied=nf-rss>

56. As of August 2020, the Centers for Disease Control and Prevention (hereinafter, “CDC”) guidance on Covid-19 protection changed to eliminate differentiation based on whether a person received vaccination and now concede that so-called Covid-19 vaccines do not prevent those injected with same from contracting, suffering and/or spreading the Covid-19 disease.
57. The majority of people now hospitalized for Covid-19 related issues have received vaccinations and caught the Covid-19 virus anyway.
58. BILH’s “Vaccine Policy” was based on false and deceptive claims that the vaccine was required to prevent employees from contracting the virus and spreading it to others, all of which was known by them.
59. Increasingly, it is becoming clear that Covid-19 vaccines do not afford the protection to the person injected or those they came into contact with and, in fact, have both short and long-term adverse effects on the injected person.
60. BILH terminated Morrill for resisting being injected due to her sincerely held religious beliefs and Morrill’s continued and long-lasting, physical side effects from the first Moderna injection and BILH refused Accommodations to her by use of masks and periodic testing, stating same to be inferior to the vaccine.
61. BILH’s instant degradation of masks and periodic testing by labeling them as an “inferior” and unacceptable accommodation, along with BILH’s unrealistic reliance on experimental vaccines, place BILH’s historical position in question and now

expose serious liberties taken by BILH with the life and well-being of Morrill and her family.

62. Morrill suffered physically, financially, emotionally, psychologically, and lost reputation, as BILH negligently and wrongly terminated her claiming that Morrill chose to voluntarily terminate her employment.

CLAIMS FOR RELIEF

COUNT I

VIOLATION OF M.G.L. CHAPTER 151, MEDICAL AND RELIGIOUS DISCRIMINATION; VIOLATION OF TITLE VII; VIOLATION OF 42 U.S.C. § 12112(a)

63. Morrill re-alleges the foregoing Paragraphs 1-62 as if set forth again here.
64. Morrill was very specific and articulated her sincerely held religious beliefs and documented her medical exemption request showing her long-lasting physical adverse reactions to the Covid-19 vaccine.
65. Morrill, at all relevant times, was engaged in religious protected activity under M.G.L. Chapter 151 and 42 USC § 2000e *et seq.* Under Title VII, it is unlawful for an employer to “fail or refuse to hire or to discharge any individual, or otherwise to discriminate against any individual with respect to his compensation, terms, conditions, or privileges of employment, because of” that individual’s religion. 42 U.S.C. § 2000e-2(a)(1).
66. An employer must “reasonably accommodate” an employee’s **religious** practice unless such accommodation would impose “undue hardship on the conduct of the employer’s business.” Id. § 2000e(j).
67. Title VII does not depend on proving the hospital is a state actor, just that it is an employer within the definition of 42 USC 2000(e)(b).

68. Morrill, at all relevant times, had a medical condition protected under State Law and under 42 U.S.C. § 12112(a) *et seq.* Morrill did establish to BILH a prima facie case under the ADA as a matter of law. Accommodation was necessary considering Morrill's physical condition.
69. Under the American Disability Act (ADA), employers may not discriminate against "a qualified individual on the basis of disability in regard to job application procedures, the hiring, advancement, or discharge of employees, employee compensation, job training, and other terms, conditions, and privileges of employment."
70. Discrimination under the ADA includes "not making reasonable accommodations to the known physical or mental limitations of an otherwise qualified . . . employee, unless [the employer] can demonstrate that the accommodation would impose an undue hardship on the operation of [its] business." 42 U.S.C. § 12112(b)(5)(A).
71. Discrimination is defined as prejudiced, unfair, or unequal treatment of people based on their personal characteristics such as race, religion, disability, age, nation of origin, or gender.
72. BILH wrongly, negligently, arbitrarily, and capriciously denied Morrill's Religious and Medical Exemption requests *and* failed to Accommodate her from having to inject herself with the Covid-19 vaccine due to her sincerely held religious beliefs and the adverse, long-lasting medical reactions she experienced after taking the first Moderna Covid-19 injection.
73. BILH at all times knew, or should have known, that the Covid-19 vaccine did not prevent contracting nor spreading of the disease.

COUNT II
CIVIL ACTION FOR DEPRIVATION OF RIGHTS UNDER 42 USC 1983; THE RIGHT
TO REFUSE THE COVID-19 VACCINE BY PLAINTIFF; VIOLATION OF
(EUA/EUI/PREP ACT)

74. Morrill re-alleges the foregoing Paragraphs 1-73 as if set forth again here.
75. This Court has federal-question jurisdiction under 42 U.S.C. § 1983 for violations by BILH of civil rights under the Fourteenth Amendment of the United States Constitution.
76. This Court has federal-question jurisdiction under 42 U.S.C. § 1983 for violations by BILH of the Emergency Use Authorization Act, 21 U.S.C. §360bbb-3 and violations to the Public Readiness and Emergency Preparedness Act, referred to as the PREP Act, 42 USC 247d-6d & 42 USC 247d-6e.
77. BILH is a state actor of the Federal Government and State Government as described.
78. Morrill contends that BILH is constrained by the CDC COVID-19 Vaccination Program Provider Agreement and each of the Food and Drug Administration letters for each of the Covid-19 vaccines approved under the Emergency Use Authorization Act.
79. It is a well-established U.S. Supreme Court precedent that a federal statute conferring a right onto an individual in unambiguous language is enforceable under 42 U.S.C. § 1983.
80. Title 42 U.S. Code § 1983 establishes a civil action for deprivation of rights. Every person who, under color of any statute, ordinance, regulation, custom, or usage, of

any State or Territory or the District of Columbia, subjects, or causes to be subjected, any citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges, or immunities secured by the Constitution and laws, shall be liable to the party injured in an action at law, suit in equity, or other proper proceeding for redress...

81. In *Maine v. Thiboutot*, 448 U.S. 1 (1980), the court held that "Even were the language ambiguous, however, any doubt as to its meaning has been resolved by our several cases suggesting, explicitly or implicitly, that the §1983 remedy broadly encompasses violations of federal statutory as well as constitutional law." See also, *Health and Hospital Corporation of Marion Cty. V. Talevski*, 599 U.S. ____ (2023).
82. In 2021, President Biden purchased all COVID-19 drugs that were under 21 U.S.C. §360bbb-3 authorization or Emergency Use Authorization statute (EUA).
83. To comply with lawful duties, the United States Government established and funded the Covid-19 vaccine program through the CDC.
84. BILH illegally established a vaccine policy as a condition of employment to Morrill.
85. BILH policymakers acted on that policy, leading to Morrill's deprivation of statutory and constitutional rights.
86. BILH negligently and wrongly terminated Morrill's employment in violation of her right to refuse the COVID-19 vaccine. The COVID-19 vaccines are under Emergency Use Authorization (EUA), Emergency Use Instructions (EUI), or the Public Readiness and Emergency Preparedness Act, referred to as the PREP Act, authority (EUA/EUI/PREP Act), all preempted by Congress only authority, none of

which can come under mandatory conditions.(42 USC 247d-6d & 42 USC 247d-6e (Prep Act); 21 U.S.C. §360bbb-3 (the EUA/EUI statute).

87. Morrill has an individual absolute Constitutional and federal statutory right to refuse the administration of an EUA, EUI and/or PREP Act- COVID-19 Vaccine, without losing a benefit to which she is otherwise entitled. Such a right is not dependent upon Morrill seeking a religious or medical exemption.
88. Congress prohibits BILH from establishing EUA, EUI, or PREP Act conditions requiring Morrill to surrender her statutory rights and Constitutional protections as a condition to enjoy the privileges and benefits offered or employment with by Morrill.
89. BILH cannot mandate the use of an unlicensed drug, biologic, or device on Morrill as a condition of employment.
90. BILH cannot require Morrill to use an EUA / EUI / PREP Act product as a condition of employment.
91. BILH's termination of employment of Morrill for refusing compliance with their mandated COVID-19 vaccine, as applied, is unlawful.

WHEREFORE, THE PLAINTIFF PRAYS THAT THIS HONORABLE COURT:

Enter Judgment against BILH, finding that their conduct was knowingly and intentionally in bad faith, with knowledge or reason to know that their acts violated Morrill's Constitutional rights, and caused substantial hardships to Morrill, and against public policy and Federal law, for damages as follows:

- A. A declaration that Morrill's constitutional rights were violated and an order requiring just, proper, and equitable relief.

- B. A declaration that Morrill's statutory rights were violated and an order requiring just, proper, and equitable relief.
- C. A finding for Morrill that each Claim and Count set forth herein and an order for an amount to be determined at the trial of this matter.
- D. Compensatory damages in the amount of Two Million Dollars ("\$2,000,000.00").
- E. Punitive damages in the amount of One Million Dollars ("\$1,000,000.00").
- F. Award reasonable attorneys' fees and costs of this action to Morrill.
- G. Such other and further relief that this Honorable Court finds meet, just, proper, and equitable.

THE PLAINTIFF DEMANDS A TRIAL BY JURY ON ALL ISSUES AND COUNTS.

Respectfully submitted,
The Plaintiff,
Catherine Morrill,
By her attorney,

DATED: January 22, 2024

/s/ Richard C. Chambers, Jr., Esq.
Richard C. Chambers, Jr., Esq.
BBO#: 651251
Chambers Law Office
220 Broadway, Suite 404
Lynnfield, MA 01940
Office: (781) 581-2031
Cell: (781) 363-1773
Fax: (781) 581-8449
Email: Richard@chamberslawoffice.com